

EXHIBIT A

State of Illinois)
) ss
County of St. Clair)

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY
IN SUPPORT OF COMPLAINT FOR FORFEITURE**

I, Ryan Bandy, declare under penalty of perjury the following:

At all relevant times, I have been a Special Agent (SA) with the Drug Enforcement Administration (DEA). The contents of this Declaration are based on information provided to me during the course of my investigation from participants in the criminal activity, from other witnesses, and from other law enforcement officers.

1. On or about Tuesday, June 9, 2020, DEA Task Force Officer Michael Reichert (TFO Reichert), obtained information from a source of information regarding a suspicious bulk shipment from the Old Dominion Freight Line located at 601 Darcy Parkway, Lathrop, California going to the Old Dominion Freight Line located at 7411 Hall Street, St. Louis, Missouri.

2. TFO Reichert contacted Old Dominion Freight Line Corporate Security and confirmed that Sergio Gabriel QUINONES had dropped off a large crate weighing 475 pounds at the Lathrop, California location in a rented box truck. QUINONES advised the package contained kettle bells, medicine balls, and used shop vacuums which QUINONES intended to ship to St. Louis, Missouri. QUINONES further advised he would be the recipient and pick up his own package when it arrived at the Old Dominion Freight Line location in St. Louis, Missouri.

3. TFO Reichert and the Old Dominion Corporate Security personnel found the

shipment to be outside of the freight industry shipping norms and not cost effective. TFO Reichert researched the cost of new/used kettle bells and found numerous businesses selling them for an average of \$1.00 per pound and medicine balls selling for approximately \$3.00 per pound. With the crate having a dry (empty) weight of approximately 150 lbs. it only left the cargo of alleged kettle bells, medicine balls, and used shop vacuums having a total weight of 325 lbs.

4. TFO Reichert factored in QUINONES pre-paying \$400.00 for the shipment, the cost of obtaining 2 separate rental box trucks at approximately \$99.00 plus .99 cents per mile, and QUINONES travel costs from California to St. Louis, the cost-to-benefit alone makes the shipment suspicious in nature as it is unlikely a profit could even be made.

5. On Wednesday, June 10, 2020, TFO Reichert was notified the crate had arrived at the St. Louis, Missouri, Old Dominion Freight facility located at 7411 Hall Street, St. Louis, Missouri. TFO Reichert learned QUINONES had scheduled the pick-up for the crate between 10:30 a.m. and 11:00 a.m. and would be driving a Penske rental truck. After receiving the above information, Agents established surveillance of the Old Dominion facility where Agents observed QUINONES retrieve the suspicious crate. Agents conducted constant visual surveillance of QUINONES as he left the Old Dominion facility and drove to the Public Storage facility located at 11580 Page Service Drive, St. Louis, Missouri, and met with Clinton SHAFFER. Agents observed QUINONES and SHAFFER open the crate and remove items (cardboard boxes and other items) from inside the crate and place those items inside the storage unit.

6. After unloading the items from the crate, both SHAFFER and QUINONES left the Public Storage Lot and drove to a residence in Maryland Heights, Missouri where they met with a male later identified as Aaron KEENER. Agents learned that KEENER has a prior

arrest for sale of marijuana near a school zone.

7. While at the residence, QUINONES removed a brown cardboard box (previously taken from within the crate) and carried it inside of the garage, accompanied by SHAFFER and KEENER.

8. As Agents continued surveillance they observed further interaction with KEENER at the residence. During those interactions, QUINONES and SHAFFER took an additional two cardboard boxes inside the residence, along with leaving with a backpack and red bank bag on separate occasions.

9. After leaving the residence with the bank bag, Agents observed SHAFFER and QUINONES arrive at a Bank of America ATM, where declarant observed SHAFFER make five (5) separate deposits into the ATM. At one point declarant observed SHAFFER place a small stack of currency on the dashboard of his rental vehicle before taking it back down and appeared to be counting it prior to one of the deposits.

10. IRS SA Jason Bamvakais reviewed surveillance photos and records provided by Bank of America, and it was determined the ATM transactions observed by agents on June 12, 2020, was a cash deposit of \$5,000.00 made by SHAFFER into a business checking account (account number ending in 5055) under the name Discount Gym Systems LLC. Agents observed what appeared to be SHAFFER making multiple deposits because ATM's can only accept a certain number of bills per transaction.

11. According to the signature card for Discount Gym Systems LLC (account ending in 5055), the business account was opened on February 6, 2020. The signature card stated that Discount Gym Systems LLC was "organized/registered" in the state of Wyoming, has a tax ID number of 84- 4223277, and is classified as a C Corporation. The signature card listed SHAFFER as

the President of Discount Gym Systems LLC. The address on the bank statements for Discount Gym Systems LLC is 1269 S. Main Street, Suite 326, Manteca, California.

12. According to Wyoming Secretary of State Website, Discount Gym Systems LLC was formed on December 6, 2019, and currently has an “active” status. The Registered Agent for the business is Wyoming Registered Agent, and the principal and mailing address for the business is listed as 1621 Central Avenue, Cheyenne, WY, 82001. Agent’s research showed there are significant benefits to forming an LLC in Wyoming, such as, no state taxes and Member and/or Manager Names are never required on public record for an LLC in Wyoming. Therefore, public records related to Discount Gym Systems LLC will not show SHAFFER as the owner or manager of the business.

13. An analysis of the bank account by IRS SA Bamvakais revealed the account does not appear to operate as a typical business account. For example, from the opening of the account (February 6, 2020) through June 16, 2020, the account had a total of approximately \$33,000 in deposits. Of the total deposits, approximately 65% (\$21,500) were cash deposits, \$12,500 of those cash deposits were ATM deposits in the St. Louis, Missouri area. The remaining \$9,000 in cash deposits were made in Charlotte, North Carolina. The account also had nine (9) money orders totaling \$8,500 (approximately 25% of total deposits) deposited into the account. All the money orders listed SHAFFER as the purchaser and were made payable to Discount Gym Systems LLC.

14. The bank records also revealed that SHAFFER made another trip to the St. Louis, Missouri area in April of 2020. For example, there were two charges for the Embassy Suites Hotel in Bridgeton, Missouri on April 20, 2020. In addition, there were three (3) cash deposits via ATMs in the St. Louis, Missouri area totaling \$7,500 in April of 2020 (\$3,000 on 4/23/20, \$2,000 on 4/28/20, and \$2,500 on 4/29/20).

15. The bank records also revealed SHAFFER has been utilizing electronic payment applications, such as Venmo, PayPal, and Zelle, to move funds. Bank records show SHAFFER was involved in approximately \$10,000 in electronic payment application transactions.

16. On June 14, 2020, TFO Jake Degener (TFO Degener) accompanied by his narcotic-trained canine Blu, was requested to deploy his K-9 partner between the Public Storage Facility buildings D and E. TFO Degener advised that canine Blu alerted to storage locker E007.

17. During additional surveillance Agents observed SHAFFER and QUINONES purchase food saver/heat sealed bags, air fresheners, plastic bubble wrap, and an industrial size roll of orange shrink-wrap. After retrieving the packing items, SHAFFER and QUINONES again rented a Penske box truck.

18. After renting the truck, SHAFFER went back to a hotel where he was observed carrying the packing materials inside. After being inside the hotel for a brief period, SHAFFER returned to his vehicle with a black backpack and drove to the storage locker. Simultaneously, while SHAFFER was at the hotel, QUINONES went to the storage locker where he loaded previous items back into the crate, along with additional items including a black in color safe.

19. Prior to QUINONES finishing loading the crate, SHAFFER arrived at the storage shed where SA Ayla Horlick observed SHAFFER retrieve an orange in color brick shaped item and place it inside the safe. Once the items were all inside the crate, both SHAFFER and QUINONES finished sealing the crate, including using the orange shrink wrap previously seen during surveillance.

20. After loading the crate, QUINONES traveled to YRC Freight Company, located at 400 Barton Street, St. Louis, Missouri. QUINONES met with YRC staff and had the wooden

crate off loaded, where YRC staff secured it until Agents arrived.

21. At approximately 3:00 p.m., TFO Degener, who was accompanied by his narcotic-trained canine Blu, was requested to deploy his K-9 partner at the YRC facility. TFO Degener advised that Blu alerted to the wooden crate that was dropped by QUINONES.

22. TFO Reichart and SA Kevin Lauman took possession of the wooden crate and transported it to the St. Louis DEA Division office, where the wooden crate was placed in a secured location.

23. On June 19, 2020, agents obtained a search warrant and a search of the container was performed. Inside of the safe, agents observed a yellowish colored plastic bag which was wrapped around orange shrink wrap, aluminum foil and then two (2) heat sealed bundles of United States Currency.

24. On June 23, 2020, TFO Greg Hosp received a call from Sergio G. QUINONES wanting to know why his package was seized. QUINONES denied knowing anything about a black safe or money being inside of the crate. QUINONES advised he would have his attorney contact TFO Hosp via phone.

25. KEENER was ultimately interviewed regarding his interactions with SHAFFER and QUINONES. KEENER stated that SHAFFER has been supplying him with marihuana.

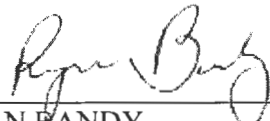
26. On June 23, 2020, the currency seized from the black safe located inside of the shipping crate was transported to Loomis for an official count. It was determined that the total amount seized totaled \$38,450.00.

27. Based on the foregoing, declarant believes that the subject-matter \$38,450.00 in United States Currency is property which constitutes money furnished or intended to be furnished

by a person in exchange for a controlled substance, or proceeds traceable to such an exchange, or money used to facilitate a violation of 21 U.S.C. § 801 *et seq.*

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 13th day of January, 2021.



RYAN BANDY
Special Agent
Drug Enforcement Administration